

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

ADJUSTACAM LLC

v.

AMAZON.COM, INC.; ET AL.

NO. 6:10-cv-329-LED

JURY

PLAINTIFF'S ANSWER TO WALMART'S COUNTERCLAIMS

Plaintiff AdjustaCam LLC ("AdjustaCam") answers the counterclaims (Dkt No. 497) of Defendant Wal-Mart Stores, Inc. ("Walmart"), by corresponding paragraph number, as follows:

1. Denied.
- 2-3. Admitted.
4. Admitted as to subject matter jurisdiction over counterclaims. Denied as to merits of counterclaims.
5. Admitted as to personal jurisdiction over AdjustaCam.
6. Admitted as to venue over counterclaims. Denied as to merits of counterclaims.
7. Admitted that AdjustaCam is the exclusive licensee of all substantial rights to the '343 Patent, including the right to bring this suit and to recover for damages.
8. Admitted that AdjustaCam has sued Walmart for infringing the '343 patent. Admitted as to subject matter jurisdiction over counterclaims. Denied as to merits of counterclaims.
- 9-11. Denied
12. To the extent necessary, AdjustaCam denies that Walmart is entitled to the relief requested in its prayer for relief. In addition, to the extent necessary, AdjustaCam generally denies any allegation in the counterclaims not specifically admitted above, and AdjustaCam re-

alleges infringement, validity and damages, and denies any allegations in the counterclaim adverse to same.

PRAYER FOR RELIEF

WHEREFORE, AdjustaCam respectfully requests that this Court enter judgment denying and dismissing Walmart's counterclaims, and that the Court enter judgment in favor of AdjustaCam as requested in AdjustaCam's complaint, as amended or supplemented.

September 19, 2011

Respectfully submitted,

ADJUSTACAM LLC

By: /s/ John J. Edmonds
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ATTORNEYS FOR PLAINTIFF
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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

September 19, 2011

/s/ John J. Edmonds

John J. Edmonds